

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

HEATHER RHIANNON MORGAN (AKA:  
Razzlekhan),

Defendant.

**Application for  
Order of Continuance**

**22 Mag. 1280**

STATE OF NEW YORK )  
COUNTY OF NEW YORK ) ss.  
SOUTHERN DISTRICT OF NEW YORK )

MAGGIE LYNAUGH, pursuant to 28 U.S.C. §1746, hereby affirms the truth of the following under penalties of perjury:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the preliminary hearing date set in this matter.

2. The defendant was charged in a complaint, dated February 7, 2022, out of the United States District Court for the District of Columbia with violating Title 18 United States Code, Sections 1956(h) (money laundering conspiracy), and 371 (conspiracy to defraud the United States). On February 8, 2022, the defendant was arrested in New York and presented in a Rule 5(c)(3) proceeding before Magistrate Judge Debra Freeman, who released the defendant principally on a \$3,000,000 bond co-signed by two financially responsible persons, and partially secured by her parents' residence. The Government appealed that grant of bail to Chief Judge Howell of the United States District Court for the District of Columbia. Chief Judge Howell affirmed Magistrate Judge Freeman's bail decision.

3. The defendant is being represented by Marshall Miller, Esq. and Elizabeth

Slater, Esq., of Kaplan Hecker & Fink LLP.

4. A preliminary hearing is presently set for March 24, 2022 in this Court.

5. The Government and defense counsel are engaged in discussions concerning a possible disposition of this matter, and do not anticipate a resolution before the March 24, 2022 preliminary hearing date.

6. Therefore, the Government is requesting a continuance until May 2, 2022 for the preliminary hearing in order to continue the foregoing discussions. Defense counsel consented to this request by email on March 17, 2022.

7. A motion has been filed before the United States District Court for the District of Columbia addressing issues under the Speedy Trial Act.

Dated: New York, New York  
March 23, 2022



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MAGGIE LYNAUGH  
Assistant United States Attorney  
(212) 637-2448

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Upon the application of the United States of America and the affirmation of Maggie Lynaugh, Assistant United States Attorney for the Southern District of New York, it is found that the defendant was charged with violating Title 18 United States Code, Sections 1956(h) (money laundering conspiracy), and 371 (conspiracy to defraud the United States) in a complaint, dated February 7, 2022, out of the United States District Court for the District of Columbia, and was arrested on February 8, 2022;

It is further found that on February 8, 2022, the defendant was presented in a Rule 5(c)(3) proceeding before Magistrate Judge Debra Freeman, who released the defendant principally on a \$3,000,000 bond co-signed by two financially responsible persons, and partially secured by her parents' residence;

It is further found that the Government appealed that grant of bail to Chief Judge Howell of the United States District Court for the District of Columbia, and that Judge Howell affirmed Magistrate Judge Freeman's bail decision;

It is further found that Marshall Miller, Esq. and Elizabeth Slater, Esq., counsel for the defendant, have been engaged in, and are continuing, discussions concerning a possible disposition of this case with the Government;

It is further found that the Government has requested a continuance until May 2, 2022 for the preliminary hearing to engage in further discussions with counsel about the disposition of this case and that the defendant, through counsel, has consented that such a continuance may be granted for that purpose; and

It is further found that a motion has been filed before the United States District Court for the District of Columbia addressing issues under the Speedy Trial Act; and therefore it is

ORDERED that the request for a continuance of the preliminary hearing date is hereby granted until May 2, 2022, and that a copy of this Order and the affirmation of Assistant United States Attorney Maggie Lynaugh be served by email on defense counsel by the United States Attorney's Office.

Dated: New York, New York  
March 24, 2022



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Barbara Moses  
United States Magistrate Judge  
Southern District of New York